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January 26, 2016

Hon. Brenda K. Sannes  
United States District Court  
Northern District of New York  
James M. Hanley Federal Building  
100 S. Clinton St.  
Syracuse, NY 13261

**Re: United States v. Clayton Brothers  
15-CR-198 (BKS)**

Dear Judge Sannes:

I write to respectfully request permission to file four documents for the Court's consideration, in deciding whether to suppress the evidence against Mr. Brothers. Mr. Brothers asserts that his prior lawyer overlooked this important evidence. These documents consist of the following:

- a) A Traffic Violation Ticket, dated May 11, 2014 ("Traffic Violation Ticket") (**Exhibit "A"**);
- b) A Parole Violation Report, dated May 6, 2014 ("Parole Violation Report") (**Exhibit "B"**);
- c) A New York State Incident Report, dated April 23, 2014 ("Incident Report") (**Exhibit "C"**);
- d) Telephone records from the Brothers' residence ("Telephone Records") (**Exhibit "D"**).

Each will be discussed in turn.

*Parole Violation Report*

The Defendant requests permission to submit a Parole Violation Report dated May 6, 2014, which the defense only received from the Government on January 21, 2016. This report is critical to the issue of whether or not Jamie Brothers consented to the search. During his testimony, Parole Officer Christopher Lawrence testified that on the night of April 28, 2014, he was contacted by Jamie Brothers who allegedly told him that she "found some weapons in the house." (Tr. 15) In sharp contrast, the Parole Violation Report contains a sworn statement from John Parker which states "I told Jamie and then called Chris Lawrence" (Supporting Deposition,

Page 1 of 2). This suggests that Jamie Brothers did not consent to the search, and certainly calls into question Parole Officer Lawrence's testimony. It is submitted that the Court should give more weight to Parker's statement, set out in the Parole Violation Report, in circumstances where his statement was made on April 29, 2014, shortly after the search. In contrast, Parole Officer Lawrence's recollection during the hearing took place more than a year after the occurrence.

The Parole Violation Report also demonstrates that Mr. Brothers was charged with four parole violations, including the following:

CHARGE #2: On 4/23/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (4) of his release when he failed to notify his parole officer of his change in residence when he moved from his approved residence located at 861 Blanchard Hill Road, Russell, New York, to an unknown location although he had an immediate and continuing duty to make such notification to PO Lawrence.

CHARGE #3: On 4/24/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (3) of his release when he left the State of New York and/or an area defined in writing, specifically St. Lawrence County without the permission of his parole officer when he traveled to Winchester, Virginia, without the permission of PO Lawrence.

This supports Mr. Brothers' argument that there was an attenuated parole search. Simply stated, the fact that Mr. Lawrence already had grounds to violate Mr. Brothers on April 24, 2014, proves that he could not possibly conduct a valid parole search subsequent to that date given that he already had grounds to violate Mr. Brothers.

#### *New York State Incident Report*

The Defendant requests permission to submit a New York State Incident Report which states in pertinent part:

On 04/24/14, I advised LAWRENCE of my investigation and he stated C. BROTHERS is a level 4 offender. LAWRENCE stated he could violate him based on the fact he had police contact on 04/10/14 for a V&T ticket and did not report it to him and based on the supporting depositions in this case.

This too supports Mr. Brothers' argument that there was an attenuated parole search. As noted above, the fact that Mr. Lawrence already had grounds to violate Mr. Brothers on April 24, 2014, proves that he could not possibly conduct a valid parole search subsequent to that date given that he already had grounds to violate Mr. Brothers.

*Telephone Records*

Telephone records from the Brothers household demonstrate that the State Police (tel. 315-379-0057) contacted the Brothers household at 10:04 a.m. EST (2:04 p.m. GMT) on April 28<sup>th</sup>, 2014.<sup>1</sup> The records further show that Christopher Lawrence (tel. 315-317-9590) called the Brothers household at 10:49 a.m. EST (2:49 p.m. GMT), and again at 10:59 a.m. (2:59 p.m. GMT). These incoming calls from law enforcement agents, on the morning of April 28<sup>th</sup>, 2014, support the Defendant's contention that John Parker was acting as an agent of law enforcement when he conducted the search that led to the guns.

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For the reasons set out above, Mr. Brothers respectfully submits that the Court should reopen the suppression hearing and consider each of the aforementioned documents in determining whether the evidence against Mr. Brothers should be suppressed.

Respectfully,

Merchant Law Group LLP

By:   
Daniel DeMaria

cc: AUSA Douglas G.N. Collyer

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<sup>1</sup> The phone records display the time in Greenwich Meridian Time.

## EXHIBIT “A”



**B20031W3QV**

New York State - Department of Motor Vehicles  
SIMPLIFIED INFORMATION/CERTIFICATE CONCERNING VIOLATION OF LAW RELATING TO VEHICLES

The people of the State of New York  
VS.

**NEW YORK STATE POLICE**

Last Name(Defendant) <b>PARKER</b>		First Name <b>JONATHAN</b>		M.I. <b>A</b>	Date of Arraignment	
Number and Street <b>0016</b>		Apt. No.	Photo Lic Shown <input checked="" type="checkbox"/>	Court Adjudgment Record		Docket Number <b>14050015.03</b>
City <b>EL PASO</b>	State <b>TX</b>	Zip Code <b>799120000</b>	Owner is Oper. <input type="checkbox"/>	Lic. Class <b>C</b>	Date From	Date To
Client ID Number <b>33417433</b>		Sex <b>M</b>	Date Expires <b>04/26/2016</b>		Requested By	
Lic State <b>TX</b>	Date of Birth <b>1/1991</b>	Veh. Type	Year <b>2004</b>	Make <b>CHEV</b>	Color <b>WH</b>	
Plate Number <b>97HPZ9</b>		Reg State <b>TX</b>	Registration Expires <b>03/31/2013</b>			

**THE PERSON DESCRIBED ABOVE IS CHARGED AS FOLLOWS**

Time <b>02:15PM</b>	Date of Offense <b>05/11/2014</b>	IN VIOLATION OF <b>VTL</b>
Violation Section <b>0401 01A</b>		Traffic Infraction <input checked="" type="checkbox"/>
Description of Violation <b>UNREGISTERED MOTOR VEHICLE</b>		Misd <input type="checkbox"/>
		Felony <input type="checkbox"/>
		MPH <input type="checkbox"/>
		MPH ZONE <input type="checkbox"/>
		US DOT# <input type="checkbox"/>
		Comm Veh <input type="checkbox"/>
		Bus <input type="checkbox"/>
		HazMat <input type="checkbox"/>
CITY/Name <b>TOWN OF KEENE</b>	County <b>ESSEX</b>	Hwy.No <b>73</b>
Street Name <b>STATE ROUTE 73</b>		Loc.Code <b>1655</b>
		Hwy Type <b>2</b>
		NCIC/ORI <b>11501</b>

AFFIRMED UNDER PENALTY OF PERJURY

(Officer's Signature)

Officer operating radar

Date of Affirmation <b>05/11/2014</b>	Arrest Type <b>1 - Patrol</b>	Badge/Shield <b>4621</b>	Officer's Com./Div./Stat. <b>B311</b>
Officer's Last Name <b>COFFIN</b>			
First Name <b>B</b>		M.I.	

THIS MATTER IS SCHEDULED TO BE HANDLED ON THE APPEARANCE DATE BELOW IN:

**KEENE TOWN COURT**

Address <b>ST RTE 73 POB 89</b>	
City <b>KEENE</b>	State <b>NY</b>
Zip <b>12942</b>	
<input checked="" type="checkbox"/> Return by mail before or in person on:	Date <b>06/16/14</b>
<input type="checkbox"/> Must appear in person on:	Time <b>06:00PM</b>

**FOR COURT USE ONLY**

Court Code <b>NY015121J</b>	Justice Code <b>15215</b>	Date Adjudicated <b>6/30/14</b>	Date Sentence Imposed <b>6/30/14</b>
Charge Convicted of <input type="checkbox"/> AS ABOVE <input type="checkbox"/> VTL <input type="checkbox"/> Other		Disposition/Sentence	Fine <b>\$ 6</b>
Surcharge <b>\$</b>			
Bad Forfeiture Amount \$	Date	<input type="checkbox"/> LIC <input type="checkbox"/> REG <input type="checkbox"/> Rev <input type="checkbox"/> Susp <input type="checkbox"/> Mand. <input type="checkbox"/> Perm	DAYS/MONTHS/YEAR
DWI Test Type		DWI Test Results	

Amount	Date	Receipt No.
Bail		
Refund		
Fine		
Surcharge		

**SECTION 1807 OF THE VEHICLE AND TRAFFIC LAW PROVIDES THAT DEFENDANT, IN CERTAIN CASES, MUST BE INFORMED IN SUBSTANCE AS FOLLOWS:**

"A plea of guilty to this charge is equivalent to a conviction after trial, if you are convicted, not only will you be liable to a penalty, but in addition your license to drive a motor vehicle or motorcycle, and your certificate of registration, if any, are subject to suspension and revocation as prescribed by law."

To Judge or Clerk of Court: Checkmark the appropriate box or boxes below.

I HEREBY CERTIFY THAT:

- ☐ Upon arraignment, that the above instruction was given orally to the defendant.
- ☐ The defendant appeared in response to a ticket upon which the above instructions were printed in bold type, in accordance with Section 1807 of the Vehicle and Traffic Law.
- ☐ Defendant entered a plea of guilty in writing pursuant to Section 1805 of the Vehicle and Traffic Law.

I hereby certify that the information given on this certificate is a true abstract from the records of this court.

Signature of Judge or Clerk of Court \_\_\_\_\_ Date \_\_\_\_\_

Name of Judge \_\_\_\_\_

Supporting Deposition Issued: None ☒ Speeding(Gen101) ☐ Non - Speeding(Gen101a) ☐

## EXHIBIT "B"

 <b>Interstate Commission for Adult Offender Supervision</b> <small>(Revised 2/4/98)</small>		<b>OFFENDER VIOLATION REPORT</b>	
To: PENNSYLVANIA	Date: 5/6/2014	Type of supervision: <input checked="" type="checkbox"/> Parole <input type="checkbox"/> Probation <input type="checkbox"/> Other:	Is this case: <input type="checkbox"/> Registered Sex Offender <input type="checkbox"/> Victim sensitive
From: New York State	Phone #: (518) 457 - 7566	Fax #: (518) 485 - 8950	
<b>OFFENDER INFORMATION</b>			
Offender's full name (last, first, MI): BROTHERS, CLAYTON		Offender number: (DN #) [REDACTED] Sending state#:(NYSID#) [REDACTED]    Receiving state#: [REDACTED]	
AKA:			
SS#: (if available)	FBI#: (if available)	Sex: M	Race: WHITE    DOB: [REDACTED]
<b>TYPE OF REPORT (check all that apply)</b>			
<input checked="" type="checkbox"/> Violation(s) without arrest <input type="checkbox"/> Arrest <input checked="" type="checkbox"/> Absconder <input type="checkbox"/> Conviction			
<b>RECOMMENDATION</b>			
<input type="checkbox"/> Remain under supervision <input type="checkbox"/> Order offender to return to sending state <input checked="" type="checkbox"/> Warrant requested			
<b>OFFENDER CUSTODY STATUS &amp; LOCATION</b>			
<input type="checkbox"/> In custody, current location: <input type="checkbox"/> On bond, amount: \$ <input type="checkbox"/> ROR			
<b>CURRENT RESIDENCE</b>			
Offender resides with - name, relationship: JAIME BROTHERS, wife		Phone #: (315) 302-4042	
Address: 861 BLANCHARD HILL RD	City: RUSSELL	State: NY	Zip: 13684-
<b>EMPLOYMENT STATUS</b>			
<input type="checkbox"/> Employed full time <input checked="" type="checkbox"/> Unemployed/reason: SUBJECT HAS ABSCONDED			
Offender's employment:			
Employer's street address:	City:	State:	Zip:    Telephone #:
Offender's employment supervisor:		Offender's job title:	
<b>NEW ARREST INFORMATION</b>			
Date:	City:	County: Case #:	Arresting Agency: Case #:
Offense description (attach offense report, if available):			

## Offender Violation Report

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CURRENT SPECIFIC VIOLATIONS (Specify violation and provide all details to support the violation below*, including evidence, witnesses*, dates, and addresses* contact information)		
Violation	Date occurred	
1 THREATENED SAFETY/WELLBEING OF LAURYN HICKS (DOB 3-19-99) WHEN HE GRABBED HER BREASTS AND VAGINA, THROUGH HER CLOTHING, AGAINST HER WILL.	3/23/2014	
2 ON 4-23-14 SUBJECT CHANGED HIS APPROVED RESIDENCE AT 861 BLANCHARD HILL RD, RUSSELL, NY TO AN UNKNOWN LOCATION WITHOUT NOTIFYING HIS P.O.	4/23/2014	
3 ON 4-24-14 SUBJECT LEFT THE STATE OF NEW YORK WITHOUT THE PERMISSION OF HIS P.O. WHEN HE TRAVELLED TO WINCHESTER, VIRGINIA WITHOUT THE PERMISSION OF P.O. LAWRENCE.	4/24/2014	
4 ON 4-29-14 SUBJECT VIOLATED THE CONDITIONS OF HIS RELEASE WHEN HE POSSESSED A RIFLE WITHOUT THE PERMISSION OR KNOWLEDGE OF HIS P.O.	4/29/2014	
<p>*Details of current violation(s): WITH REGARD TO CHARGE # 1 PLEASE REFER TO ATTACHED DEPOSITION OF LAURYN HICKS DATED 4-23-14. WITH REGARD TO CHARGE #2 UPON BEING CONFRONTED W/ ALLEGATIONS OF SEXUAL MISCONDUCT W/ STEP DAUGHTERS AND NEPT, SUBJECT LEFT HIS APPROVED RESIDENCE ON 4-23-14 AND HAS NOT RETURNED SINCE. WITH REGARD TO CHARGE #3 SUBSEQUENT TO SUBJECT LEAVING HIS APPROVED RESIDENCE HE WAS TRACKED THRU HIS USE OF A DEBIT CARD HE USED AT SEVERAL LOCATIONS WITH USE OF THE CARD DOCUMENTED IN WINCHESTER VIRGINIA. SUBJECT HAD BEEN SUSPECTED OF POSSIBLY TRAVELLING TO HOME OF GRANDMOTHER, BETTY FORBES, WHO LIVES 1 HOUR FROM WINCHESTER AT 4 INGALLS CIRCLE, CLIFTON FORGE, VA. WITH REGARD TO CHARGE #4 A SEARCH OF SUBJECT'S RESIDENCE/PROPERTY RESULTED IN NUMEROUS CONTRABAND ITEMS BEING FOUND, SPECIFICALLY SEVERAL ASSAULT RIFLES, HIGH CAPACITY MAGAZINES, BODY ARMOR, LARGE BAG OF AMMUNITION. PLEASE REFER TO ATTACHED NYS INCIDENT REPORT # 300021 FOR DETAILED LIST OF ITEMS SEIZED.*** CHARGES RELATED TO THE "FORCIBLE TOUCHING" OF LAURYN HICKS AND POSSESSION OF THE WEAPONS ARE CURRENTLY PENDING W/ NEW YORK STATE POLICE. WITNESSES: JAMIE BROTHERS, LAURYN HICKS, ROBYN HICKS, AND JOHN PARKER RESIDE AT CASE ADDRESS # 315-302-0042. PO LAWRENCE 315-317-9864. NYS INV. NYE 518-605-1449.</p>		
Previous Violation	Date of Report	Date of Response
1		
2		
3		
4		
5		
Offender's compliance to prior sanctions following violation:		
ADDITIONAL INFORMATION		
Last known address: 861 BLANCHARD HILL RD, RUSSELL, NY 13684		
Last known employment information: Commercial Press, 6589 US HWY 11, Canton NY 13617 #315-274-		

## Offender Violation Report

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0028

Date of last face-to-face contact with offender: 4/23/2014

Details of how offender was determined to be an absconder: Contact with New York State Police Inv. Nye indicates the subject was being investigated for sexual abuse that had reportedly been ongoing for approx. 8 yrs, dating to when he resided in Texas. Follow-up investigation by P.O. revealed the subject left the residence when he was confronted with allegations by his wife. He admitted the abuse and apologized, however, met with rejection, he left the residence on his motorcycle on 4-23-14 and has yet to return. Since then, he has been tracked through debit card use. Last use of the card was on 4-24-14 at a gas station in Winchester, VA.

## NEW CONVICTION INFORMATION

Date of sentence: \_\_\_\_\_ Offense(s): \_\_\_\_\_ ☐ Felony ☐ Misdemeanor ☐ OtherDisposition: ☐ Guilty ☐ Not guilty ☐ No contest ☐ Charges withdrawn

Name and location of court: \_\_\_\_\_ Case #: \_\_\_\_\_

Sentence: \_\_\_\_\_

If incarcerated, name and address of holding agency: \_\_\_\_\_

## ATTACHMENTS

Check all information that is attached to this form:

☒ Police report☐ Toxicology report☐ Preliminary findings report☒ Other documentation regarding violationSupervising Officer/Location:  
PO LAWRENCE  
WATERTOWN SUB  
OFFICEDate:  
5-6-14

Compact Administrator/Designee:

Date:



STATE OF NEW YORK- DEPARTMENT OF CORRECTIONS AND COMMUNITY  
SUPERVISION

## VIOLATION OF RELEASE REPORT

Warrant Issued:		No Warrant:	XX
Name:	BROTHERS, Clayton	Date Released:	10/3/13 NYS Supervision
NYSID#:		Sentence ME:	12/13/15
Institution:	Interstate Coop	PRS ME:	
DIN#:		Date of Warrant:	
Date of Birth:		Warrant #:	
Offense:	Robbery 2nd	Date Enforced:	
Indeterminate Sentence:	5-0-0/20-0-0	Location:	
Determinate/PRS Sent:		Compass Level:	4

Delinquency Date: 2/23/14

Since the release of the above named individual, the subject has violated the conditions of release in the following manner.

CHARGE #1: On 2/23/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (8) of his release when his behavior threatened the safety and/or well being of himself or others when he grabbed the breasts and vagina of his stepdaughter, Lauryn Kaitlyn Hicks (DOB 3/19/99), against her wishes and without her permission. Said contact occurred while Lauryn Hicks was clothed.

CHARGE #2: On 4/23/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (4) of his release when he failed to notify his parole officer of his change in residence when he moved from his approved residence located at 861 Blanchard Hill Road, Russell, New York, to an unknown location although he had an immediate and continuing duty to make such notification to PO Lawrence.

CHARGE #3: On 4/24/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (3) of his release when he left the State of New York and/or an area defined in writing, specifically St. Lawrence County without the permission of his parole officer when he traveled to Winchester, Virginia without the permission of PO Lawrence.

CHARGE #4: On 4/29/14 in St. Lawrence County, New York, Clayton BROTHERS violated Condition (9) of his release when he possessed a rifle without the permission of PO Lawrence or without a satisfactory explanation for possession.

**POSSIBLE WITNESSES:**

PO Lawrence  
PO Tonsignant  
SPO Krupp  
Jaime Brothers  
Robyn Hicks  
Lauryn Hicks  
Jonathan Parker,  
NYSIP Investigator Nye  
NYSIP Investigator Disalvo

**DOCUMENTS PROVIDED:**

Community Supervision Release Papers

CL:mgp  
F: 5/7/14

STATE OF NEW YORK – DEPARTMENT OF CORRECTIONS AND COMMUNITY  
SUPERVISION

NAME: BROTHERS, Clayton

NYSID: [REDACTED]

DIN: [REDACTED]

Time On:	Years	00	Months	04	Days	10
Time Owed:	Years	01	Months	09	Days	20

CASE SUMMARYCURRENT SENTENCE AND CRIME OF CONVICTION

Subject is a 38 year old male who is an Interstate Coop Case from the State of Pennsylvania and has been under New York State supervision since 10/3/13 until such time as he absconded from supervision as indicated in the report herein.

Records reflect subject is serving a controlling 5-0-0/20-0-0 year sentence subsequent to a plea of guilty to the offense of Robbery 2<sup>nd</sup> Degree.

Available records are limited, however indicate that subject, along with two other co-defendants did in the course of committing a theft, unlawfully enter an occupied residence and threaten the occupants with serious bodily injury. The record further indicates subject and his co-defendants were in possession of a 9 mm handgun as well as shotguns when they committed the robbery and also did fire said firearms off numerous times outside the residence during the robbery in an attempt to scare the victims.

PRIOR PAROLE VIOLATIONS ON THE INSTANT OFFENSE

The record would not indicate any prior parole violations.

CRIMINAL HISTORY

Available records are minimal. The information in the packet we received from the Interstate Bureau is, "OFFENSE HISTORY AND PATTERN: Juvenile: One placement for Aggravated Assault. Adult: History of drug and weapon offenses. One prior incarceration in Maryland. Current offenses are Robbery, Burglary, and Criminal Conspiracy. Open detainers for Resisting Arrest, VOP and FTA-Theft".

DESCRIPTION OF CURRENT VIOLATIVE BEHAVIOR

On 4/24/14, this writer was contacted by New York State Police Investigator Nye indicating he had been contacted by subject's wife, Jamie, indicating our subject had reportedly been involved in the sexual abuse of his stepdaughters, Lauryn Hicks (DOB 3/19/99), Robyn Hicks (DOB 11/1/94) as well as subject's niece, Teresa Alvares, with the abuse dating back seven or eight years when the family all lived in Texas. The investigation revealed the abuse came to light on or about 4/22/14 when Lauryn Hicks advised her sister's boyfriend, Jon Parker, that the abuse was occurring. Additionally, the investigation indicated the abuse had been continuing as recently as this February when subject was reportedly sitting on the couch next to Lauryn when he began to crowd her on the couch and reportedly grabbed her breasts and vagina over the top of her clothes.

Further investigation revealed that when subject was confronted with the sexual abuse allegations, subject left his approved residence on 4/23/14 on his motorcycle and has not returned to his approved residence, nor has he notified his parole officer of any change of residence.

Subsequent to continued investigation and interviews with Investigator Nye and Jamie Brothers, it was discovered that subject had utilized his debit card at a gas station in Winchester, Virginia on 4/24/14, with subject not notifying or receiving permission from his parole officer to leave the county, much less the state. A review of the depositions given to the New York State Police by subject's stepdaughters indicated that he had reportedly taken a video of one of them while she

**CASE SUMMARY**

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BROTHERS, Clayton

was in the shower in the past, therefore a search of subject's computer equipment was conducted in the event he could be in possession of inappropriate material involving his stepdaughters or other minor children. A search of the data on the hard drive of the computer resulted in a finding of numerous files that were deleted with highly advanced software that left no trace of their original data. Given the emotional state of Mrs. Brothers and Robyn and Lauryn Hicks, a more extensive search was not conducted at that time; however it was requested that if they were to find any materials on the property that were suspect in nature, or if subject were to contact them, that they were to notify this writer. On 4/28/14 at approximately 10:00 pm this writer received notification from Mrs. Brothers that a long gun and other items were found in a crawl space above the closet in subject's bedroom. On 4/29/14 this officer responded to the residence at 861 Blanchard Hill with New York State Police Investigator Nye. It was at that time when Robyn Hicks boyfriend, Jon Parker, who had recently moved into the home, showed us the items that were found in the crawl space and we searched the garage area. The items found were inclusive of three assault rifles, a .50 caliber muzzle loader, Savage Arms .22 long rifle, numerous 20 and 30 round magazines, numerous rounds of ammunition as well as the body armor. A detailed list of the items is attached hereto to this report.

The above items were secured for evidence by New York State Police Investigator Nye with charges pending for the possession of the rifles and high capacity magazines in addition to charges related to subject's unwanted touching of Lauryn Hicks.

**GENERAL ADJUSTMENT TO PAROLE SUPERVISION**

Approved for supervision in New York State on 10/3/13 via Interstate Compact, this writer met with the subject and instructed him as to his conditions of release and imposed special conditions. On subsequent dates in the course of supervision, this writer reviewed the conditions with the subject and he expressed an understanding of his obligations.

Following his release the subject established a residence with his wife and stepdaughter at 861 Blanchard Hill Road, Russell, New York, where he remained until being cited for this violation.


During his supervision, the subject was initially employed as a graphics artist with Airview Graphics out of Houston, Texas and had been working out of his residence in Russell with said company. He did however obtain new employment with Commercial Press doing graphics and computer work approximately a week prior to absconding from his approved residence on Blanchard Hill.

**PRESENT STATUS**

Subject is currently considered an absconder as he has yet to return to his approved residence since he left on 4/23/14.

**RECOMMENDATION**

His whereabouts currently unknown coupled with the serious nature of additional allegations raises serious concerns as to community safety. It is the recommendation of this officer that a warrant for his arrest be issued.

  
Christopher Lawrence  
Parole Officer  
Date 5/1/14

  
D. Scott Kiang  
Senior Parole Officer  
Date 5/1/14

CL/mpr  
T: 5/7/14



**पुनः प्रकाशित पुस्तक**

DATE OF BIRTH: 1944

DEPARTMENT OF COMMERCE AND CONSUMER PROTECTION  
BUREAU OF CONSUMER PROTECTION

[illegible]

姓名: \_\_\_\_\_ 学号: \_\_\_\_\_ 班级: \_\_\_\_\_

第 1 页 共 1 页

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一、二、三、四、五、六、七、八、九、十、十一、十二、十三、十四、十五、十六、十七、十八、十九、二十、二十一、二十二、二十三、二十四、二十五、二十六、二十七、二十八、二十九、三十、三十一、三十二、三十三、三十四、三十五、三十六、三十七、三十八、三十九、四十、四十一、四十二、四十三、四十四、四十五、四十六、四十七、四十八、四十九、五十、五十一、五十二、五十三、五十四、五十五、五十六、五十七、五十八、五十九、六十、六十一、六十二、六十三、六十四、六十五、六十六、六十七、六十八、六十九、七十、七十一、七十二、七十三、七十四、七十五、七十六、七十七、七十八、七十九、八十、八十一、八十二、八十三、八十四、八十五、八十六、八十七、八十八、八十九、九十、九十一、九十二、九十三、九十四、九十五、九十六、九十七、九十八、九十九、一百。

[illegible][illegible]

\_\_\_\_\_

217 Washington, D.C.

\_\_\_\_\_

[illegible]

**பாடகர்: கவிஞர் க. பஞ்சவர்ணம்**

- [illegible]

*[Illegible handwritten notes]*

地址：上海南京路 100 号 电话：2345678

1998年12月15日

[illegible][illegible]

NEW YORK STATE - DEPT.  
CORRECTION SUPERVISION  
SPECIAL CONDITIONS OF RELEASE TO PAROLE SUPERVISION

Name: BROTHMAN, CLAYTON

Date of Release: 07/27/2015

Page: 1

NYSID: 880437448

Supervisor Name: 88/28/2015

I, BROTHMAN, CLAYTON, acknowledge that the following Special Conditions have been imposed upon me and that these Special Conditions will remain in effect until the termination of my total period of supervision 08/28/2015 unless otherwise indicated, in writing, by the Department of Corrections and Community Supervision.

(52) I will report to my assigned Parole Officer on Thursdays at 10:00 AM every week, or as directed, between the hours of 9:00 AM and 5:00 PM.

I will report to Supervisor Alice Lee at 1111 1st Ave.

Other reporting conditions:

(53) I will report to my assigned Parole Officer as directed by my Parole Officer.

(54) I will not purchase, possess or receive any alcoholic beverages. Further, I will not enter or remain in any establishment where primary purpose is the sale or consumption of alcohol.

(55) I will provide child support for my dependent children and will be in compliance with any court-ordered child support orders in effect.

(56) I will remain in the geographic confines of the country of USA. If I travel outside of the above mentioned country, I will obtain a travel order from my Parole Officer prior to departure for each travel.

(57) I will remain in my assigned residence from 9:00 PM to 7:00 AM, seven days a week. Exceptions to my confinement may be permitted with prior approval from my Parole Officer.

(58) I will live and reside at my assigned residence and have no unauthorized visitations from others without the prior approval and knowledge of my Parole Officer.

(59) I will comply with all court orders.

Release Initials: CLBWitness Initials: Lee

Date: 10/06/2015

New York State - DOCS  
Community Supervision  
SPECIAL CONDITIONS OF RELEASE TO PAROLE SUPERVISION

Page: 2  
Name: BROTHERS, CLAYTON  
NYSID: 000457445  
Date of Release: 07/18/2013  
Supervision Expires: 06/28/2015

I hereby certify that I have read and understand the above Special Conditions of my release and that I have received a copy of these Special Conditions.

Signed this 3<sup>rd</sup> day of July, 2013  
Releasee: [Signature] Witness: Palazzo #1574

1) copy to Releasee 2) copy to Area Office 3) copy to Central Office

FORM 0823A (09/2008)

Print Date: 10/04/2013

SDNY-4 (2009)

New York State Police

## SUPPORTING DEPOSITION (CPL § 103.20)

PAGE 1 OF 2

THE PEOPLE OF THE STATE OF NEW YORK

-VS-

Clayton Brothers

(continued)

## LOCATION OF INCIDENT

STATE OF NEW YORK Criminal COURTCOUNTY OF St. LawrenceTown of Russell

## LOCATION OF DEPOSITION

STATE OF NEW YORK

COUNTY OF St. LawrenceTown of RussellOn DATE 12/29/14 at LOCATION 152-3045 before NAME John A. Beltrami

state the following: I was currently at my residence @ 861 Blanchard Hill Rd, Russell, NY awaiting my law firm at the time regarding some A. David. Yesterday, Clayton Brothers' two officers, Chris Lawrence, and I also. Federal agents were at my place looking through computer's belonging to Clayton Brothers. I live here with my girlfriend, Kelly, my brother, George, and their mother, Tami. Clayton is married to Tami and is the stepfather to George & Kelly. Early last week, we found out Clayton had been contacting Lawrence and Clayton told the area yesterday before Chris Lawrence & the Federal Agents left, they told me to look around the property for anything suspicious. Last night, I found a crawl space above the closet in Tami's & Clayton's bedroom. I also went into the crawl space and found a .50 caliber handgun with a clear bag containing 4 rounds of it.

## NOTICE

(Penal Law § 210.40)

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.

Affirmed under penalty of perjury

On 29 day of April, 2014

-OR-

Subscribed and sworn to before me

On 29 day of April, 2014

This has been read to me and I understand its contents.

Signature

Clayton BrothersDate 12/29/14

2/1 p

ENCLOSURE

NEW YORK STATE POLICE

2014-05-06 12:57

05/06/2014 14:50

Exhibit 100-1000

no 2, 2

SUPPORTING DEPOSITION CONTINUATION SHEET

People v. Clayton, Jeffrey

rest of room, and I talked with...  
I told Tom and then called Chris Lawrence.  
This morning, before Chris Lawrence showed up,  
I went out into the garage behind the house.  
I made my way to the back corner of the  
garage and located a shipping piece of plywood  
on the ceiling. I slid the piece of plywood down  
located on the white panel. I went  
up into the attic by the stairs. I  
found 3 assault rifles, a regular rifle, and  
numerous large magazine clips. I found  
assault rifles were wrapped in a white plastic  
bag. One of the rifles was wrapped in the other  
assault rifle was in a white plastic bag with  
the other. The regular rifle was just lying  
there, not looking around. In front of me was  
a box with Clayton's name on it.  
I turned all the property over to Sgt.  
Lawrence who turned it over to the State Police.  
The police did not take the Tom, Robert, or Mary.

FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO  
SECTION 160.40 OF THE PENAL LAW.

Clayton, Jeffrey

2/1/16

EXHIBIT 100-1000

100-1000-1000

EXHIBIT 100-1000

EXHIBIT 100-1000

EXHIBIT 100-1000





1. Agency 62 HUCKLEBERRY - 00002	2. Date/Period 0000	3. Incident No. INCIDENT REPORT	4. Date 01/14/2014	5. Case No. NY140108	6. Reporter No. 343802
7. Date Reported (Day, Mo, Year) THURSDAY 01/09/2014 09:00	8. Date Received (Day, Mo, Year) SATURDAY 01/10/2014 09:00	9. Date Received (Day, Mo, Year) THURSDAY 01/09/2014 09:00			
10. Incident Type UNLAWFUL POSSESSION OF WEAPON			11. Suspect Name		
12. Reporter Address (Street Name, Bldg. No., Apt. No.) 601 BLANCHARD HILL ROAD					
13. City/State/Zip RUSSELL NEW YORK 13444					
14. Location Code (FBI/DOJ)	15. No. of Victims	16. No. of Suspects	17. Victim also Unsubstantiated?		
RUSSELL TOWN 4379	0	1			
18. Location Type SINGLE FAMILY HOME					

## ASSOCIATED PERSONS

19. TYPE	20. Name (Last, First, Middle, Title)	21. DOB	22. Address (Street Name, Bldg. No., Apt. No., City, State, Zip)	23. Phone (Day, Night)
SUSPECT	BROTHERS, CLAYTON T	[REDACTED]	601 BLANCHARD HILL ROAD RUSSELL NY 13444	(315) 323-4443

## SUSPECT

24. Person ID [REDACTED]	25. Type SUSPECT	26. Name (Last, First, Middle) BROTHERS, CLAYTON T
27. Apparent Location		28. Address (Street Name, Bldg. No., Apt. No., City, State, Zip) 601 BLANCHARD HILL ROAD RUSSELL NY 13444
29. Home Phone (315) 323-4443	30. Work Phone [REDACTED]	31. Social Security [REDACTED]
32. DOB [REDACTED]	33. Age 35	34. Gender MALE
35. Race WHITE	36. Height 5'10"	37. Weight 180 lbs
38. Eyes BROWN	39. Hair BROWN	40. Build MEDIUM
41. Employer/Referral		42. Employer Address NY
43. Known/Marked/Notified (Description)		
44. Alias/Other Names/Hidden Name		
Last Name	First Name	Middle Name

## PROPERTY

45. Name BROTHERS, CLAYTON T	Property Status RECOVERED
Property Type FIREARM	Item or Asset / Drug CALIBER 12 GAUGE ENFORCEMENT CARTRIDGE
Serial No. 11072633	Value \$ 1,500.00
Description Rem 12 Gauge Law Enforcement Cartridge w/ Nylon Gauge, s/n 11072633, 1.50 mm cal.	

88. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	DPMS CARBINE WITH SCOPE
Serial No.	FN167433X	Qty/Measure	Value \$ 1,800.00
Description	-Asset88-DPMS Carbine with scope, sight comb mount, air Fifth-AM, 5.56 mm cal.		
89. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	510 SAUER PISTOL
Serial No.	TH000000	Qty/Measure	Value \$ 1,800.00
Description	-Asset89-510 Sauer Pistol with red dot sight, comb mount, air TH000000, 5.56 mm cal.		
90. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	THOMPSON CENTER ARMS .30 CAL.
Serial No.	KCM4411	Qty/Measure	Value \$ 200.00
Description	-Asset90-Thompson Center Arms .30 cal Newton Massachusetts Rifle, air K144111		
91. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	SANAGE ARMS .22 LONG RIFLE
Serial No.	UNKNOW	Qty/Measure	Value \$ 200.00
Description	-Asset91-Sanage Arms .22 long rifle/2000 mm, air unknown		
92. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	30 ROUND MAGAZINES
Serial No.	NONE	Qty/Measure	Value \$ 200.00
Description	-Asset92-30 Round 5.56 30 round capacity magazine fitted to various capacity		
93. Name	BROTHERS, CLAYTON T	Property Status	RECOVERED
Property Type	FIREARMS	Make or Model / Drug	30 ROUND MAGAZINES
Serial No.	NONE	Qty/Measure	Value \$ 100.00
Description	-Asset93-30 round Brownells 223/5.56 30 round capacity magazine-asset		



Off. Name BROTHERS, CLAYTON T	Property Status RECOVERED	
Property Type FIREARMS	Make or Model / Brand 10-ROUND MAGAZINE	
Serial No. NONE	Qty/Measure	Value \$ 50.00
Description -insert 1 grey metal Colt .22/.5.4M 10 round capacity magazine-unknown number of rounds		
Off. Name BROTHERS, CLAYTON T	Property Status RECOVERED	
Property Type FIREARMS	Make or Model / Brand SOFT BODY ARMOR	
Serial No. NONE	Qty/Measure	Value \$ 200.00
Description -insert 10-soft body armor with additional black body armor		
Off. Name BROTHERS, CLAYTON T	Property Status RECOVERED	
Property Type FIREARMS	Make or Model / Brand 10-ROUND MAGAZINE	
Serial No. NONE	Qty/Measure	Value \$ 500.00
Description -insert 10 - black nylon bag containing multiple rounds of rounds of other ammunition		
Total Property Value: \$ 650.00		

P. 10/10/14

EXHIBIT 10

01/26/2016 12:24 agnewburg police department

**REMARKS:**

CR-4 (Rev. 10/01)

SUPPORTING DEPOSITION / CPL § 120.20

New York State Police

Page 1 of 4

THE PEOPLE OF THE STATE OF NEW YORK  
VS

CLAYTON T. BROTHERS

DEPOSITION(S)

LOCATION OF INCIDENT	
STATE OF NEW YORK, LOCAL CRIMINAL COURT	
COUNTY OF ST. LAWRENCE	
TOWN OF RUSSELL	

LOCATION OF DEPOSITION	
STATE OF NEW YORK	
COUNTY OF ST. LAWRENCE	
VILLAGE OF CANTON	

On 04/23/14 at 4:34 PM I, LAURYN KAITLYN HICKS, [REDACTED]

STATE THE FOLLOWING:

I AM CURRENTLY AT THE STATE POLICE STATION IN CANTON SPEAKING WITH INVESTIGATOR CHRISTOPHER NYE REGARDING MY DAD, CLAYTON BROTHERS. I AM 15 YEARS OLD AND A 9<sup>TH</sup> GRADER AT EDWARDS-KNOX CENTRAL HIGH SCHOOL. CLAYTON IS NOT MY BIOLOGICAL FATHER. HE MARRIED MY MOTHER, JAIME (HICKS) BROTHERS, WHEN I WAS ABOUT 4 YEARS OLD. I WAS BORN IN GALVANSTON, TX AND RAISED IN CLEAR LAKE TEXAS. WHEN I WAS ABOUT 5 YEARS OLD, MY MOTHER AND CLAYTON BOUGHT A 2 STORY HOUSE LOCATED AT 1311 TEAL GLEN COURT IN CLEAR LAKE, TX. WE LIVED THERE WITH MY BROTHER, GEORGE HICKS, AND MY SISTER, ROSYNN HICKS. I REMEMBER SHORTLY AFTER MOVING INTO THE HOUSE ONE NIGHT I HAD A BAD DREAM, SO I WENT INTO MY MOTHER AND CLAYTON'S BEDROOM AND GOT INTO BED WITH THEM. I WAS IN BETWEEN THEM IN THE BED. ONCE I GOT INTO THEIR BED, I FELL ASLEEP FOR AWHILE. AFTER AWHILE, I WAS WOKEN UP BY CLAYTON HAVING HIS HAND DOWN MY PANTS. UNDERNEATH MY UNDERWEAR, I WAS CONFUSED SO I GOT OUT OF THEIR BED.

ABOUT A FEW DAYS AFTER THIS HAPPENED, CLAYTON CAME INTO MY ROOM ONE MORNING BEFORE DAWN. I WAS SLEEPING AND I WOKE UP TO HIM HAVING HIS HANDS TOUCHING MY VAGINA UNDERNEATH MY UNDERWEAR. HE NEVER SAID ANYTHING TO ME. I DIDN'T KNOW WHAT WAS GOING ON AND WAS FREAKING OUT. HE EVENTUALLY STOPPED AND LEFT. CLAYTON KEPT COMING INTO MY ROOM EARLY IN THE MORNING, BEFORE EVERYBODY WAS UP, AND TOUCHING MY PRIVATE SPOT UNDER MY UNDERWEAR. THIS CONTINUED ON A WEEKLY BASIS FOR ABOUT A COUPLE YEARS. SOMETIMES IT WOULD OCCUR ONCE A WEEK AND SOMETIMES IT WOULD OCCUR MORE OFTEN. HE WOULD ALSO TOUCH MY PRIVATE SPOT IF I HAD A BAD DREAM AND GOT INTO BED WITH HIM AND MY MOTHER.

AFTER A COUPLE YEARS OF THIS, CLAYTON STARTED TO TAKE MY HAND AND MAKE ME TOUCH HIM IN HIS PRIVATE AREA. BY PRIVATE AREA, I MEAN HIS PENIS. LLL

NOTICE (Penal Law Sec. 210.40)	
In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.	
Affirmed under penalty of perjury	
This 23 day of APRIL, 2014	Signature of Deponent - LAURYN KAITLYN HICKS, 04/23/14
Subscribed and sworn to before me this day of 2014	Signature of Officer - [REDACTED] 04/23/14
Notary Public for the State of New York	

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15:00 operation 5, nys police department 4/26/2014

GENE-4 (3/4/02)

## SUPPORTING DEPOSITION (CPL § 100.20)

New York State Police

Page 2 of 4

THE PEOPLE OF THE STATE OF NEW YORK

VS.

CLAYTON T. BROTHERS

DEFENDANT

HE WOULD JUST TAKE MY HAND AND SAY IT WOULD BE OK. HE WOULD JUST TAKE MY HAND AND MOVE IT AROUND ON HIS PENIS. THIS STARTED IN THE MORNING WHEN HE WOULD COME INTO MY ROOM. AFTER AWHILE HE WOULD ASK ME TO GO TO THE BATHROOM WITH HIM. ONCE IN THE BATHROOM, HE WOULD TAKE MY HAND AND HAVE ME TOUCH HIS PENIS. SOMETIMES THIS WOULD LAST FOR OVER AN HOUR. AROUND THE TIME THIS WAS GOING ON, CLAYTON WOULD TELL ME THAT I WOULD HAVE TO BE QUIET AND NOT TELL ANYBODY ABOUT WHAT WAS GOING ON OR ELSE I WOULD RUIN THE FAMILY.

CLAYTON HAD MADE A ROOM IN THE GARAGE FOR HIS WORK. SOMETIMES HE WOULD WAKE ME UP AND PULL ME OUT OF BED AND TAKE ME TO THE ROOM IN THE GARAGE. ONCE IN THE ROOM, HE WOULD TOUCH MY VAGINA AND HE WOULD HAVE ME TOUCH HIS PENIS. I DON'T THINK I COULD COUNT THE NUMBER OF TIMES CLAYTON TOUCHED MY PRIVATE PART OR HAD ME TOUCH HIS PENIS.

WHEN I WAS AROUND 8 YEARS OLD, MY COUSIN, TERESA ALBARES, WAS LIVING WITH US AND STAYING IN MY BEDROOM WITH ME. MY BEDROOM WAS ON THE SECOND FLOOR. TERESA WOULD HAVE BEEN AROUND 10 YEARS OLD AT THE TIME. WE HAD BUNK BEDS AND I WOULD SLEEP ON THE TOP BUNK AND SHE WOULD SLEEP ON THE BOTTOM BUNK. ONE NIGHT AROUND 2 OR 3 AM, CLAYTON CAME INTO OUR ROOM WHEN THE LIGHTS WERE OFF AND WE WERE SLEEPING. WHEN CLAYTON GOT INTO THE ROOM, HE WOKE TERESA UP AND THEY WOKE ME UP. ALL THREE OF US WERE SITTING ON THE FLOOR IN THE MIDDLE OF THE ROOM. CLAYTON TOLD TERESA TO GET ON HER HANDS AND KNEES. WHILE TERESA WAS DOING THIS, CLAYTON HAD HER TAKE OFF ALL OF HER CLOTHES. CLAYTON ONLY HAD A TANK TOP ON. CLAYTON STARTED TO EXPLAIN WHAT HE WAS ABOUT TO DO. CLAYTON STARTED TO HAVE SEX WITH TERESA. BY SEX, I MEAN HE PUT HIS PENIS IN HER VAGINA. THE LIGHTS WERE OFF, BUT I COULD STILL SEE THEM. THEY WERE SIDEWAYS TO ME AND I WAS A FEW FEET AWAY. CLAYTON STOPPED IN THE MIDDLE OF IT AND TRIED TO CONVINCE ME TO DO THE SAME THING. I STARTED CRYING AND TOLD HIM I DIDN'T WANT TO. HE TOLD ME NOT TO BE SCARED AND EVERYTHING WOULD BE OK. I WOULDN'T LET HIM TOUCH ME. I WENT BACK TO BED AND TERESA AND CLAYTON LEFT THE ROOM. I WOKE UP THE NEXT MORNING AND TERESA AND CLAYTON WERE SITTING ON THE COUCH IN THE SECOND LIVING ROOM BY THE DINING ROOM, UNDER A BLANKET. CLAYTON TOLD ME IT THAT TERESA GAVE HIM A BLOWJOB. HE TOLD ME IT WOULD BE OK AND TRIED TO CONVINCE ME TO GIVE HIM ONE TO. HE SAID HE WOULD PUT SYRUP ON HIS PENIS. I REFUSED TO DO THAT. THIS IS THE ONLY THING I REMEMBER WITH TERESA.

I REMEMBER WHEN I WAS IN 4<sup>TH</sup> GRADE, MY MOM, MY BROTHER, AND MY SISTER WENT TO WALMART. WHILE THEY WERE GONE, I WENT TO TALK TO CLAYTON BEFORE HE WAS GETTING IN THE SHOWER. CLAYTON TOLD ME TO COME INTO THE BEDROOM. WE SAT DOWN ON THE BED TO TALK. HE KEPT CHANGING THE SUBJECT AND NOT LETTING ME TALK. HE KEPT INTERRUPTING ME. HE TOLD ME TO TAKE MY SHORTS OFF. I STARTED TO TAKE THEM OFF BUT HESITATED. SO HE GOT AGGRESSIVE AND PULLED MY SHORTS DOWN. HE TOLD ME TO GET ON MY HANDS AND KNEES ON THE BED. I STILL HAD MY TOP ON. HE TOOK HIS ROBE OFF. HE WAS TRYING TO PUT HIS PENIS IN MY VAGINA. THE DOOR TO THE HOUSE OPENED AND MY FAMILY WAS BRINGING GROCERIES INTO THE HOUSE. CLAYTON THREW MY SHORTS AT ME AND TOLD ME TO HIDE IN THE CLOSET IN THE BATHROOM. MY MOM WAS LOOKING FOR ME AND CALLED MY NAME. THIS WENT ON FOR ABOUT 30 MINUTES. I WAS CRYING BECAUSE I DIDN'T WANT TO GET INTO TROUBLE. THAT IS WHY I WAITED SO LONG. WHEN I FINALLY CAME OUT OF THE BEDROOM, MY MOM GOT MAD AT ME AND WAS ASKING ME WHY I WAS IN HER ROOM. I WAS IGNORING HER. SHE WAS TALKING TO CLAYTON AND ASKED ME IF THERE WAS ANYTHING I NEEDED TO TELL HER ABOUT HIM AND I TOLD HER NO.

NOTICE		(Penal Law Sec. 210.45)	
In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a offense under this law of the state of New York punishable as a Class A Misdemeanor.			
Affirmed under penalty of perjury			
This	23	day of	APRIL, 2014
at			
*Subscribed and sworn to before me			
This		day of	2014
I, the undersigned, being a duly qualified notary public, do hereby certify that the foregoing is a true and correct copy of the deposition of the deponent.			
Signature of Notary Public		Signature of Dependent - LAURYN KUTLYN	
HICKS 03/10/14		HICKS 03/10/14	
Witness		Witness	
Clayton T. Brooks		Clayton T. Brooks	
Notary Public		Notary Public	
Notary Public		Notary Public	

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04/24/2014 13:43 oydensburg police department



DE-14 (Rev. 12/14)

New York State Police

## SUPPORTING DEPOSITION (CPL § 100.20)

Page 3 of 4

THE PEOPLE OF THE STATE OF NEW YORK

VS.

CLAYTON T. BROTHERS

DEFENDANT

I JUST GOT IN TROUBLE FOR HIDING.

NOTHING HAPPENED FOR ABOUT ANOTHER YEAR OR TWO BECAUSE WE HAD GOT EVICTED FROM OUR HOUSE AND I WAS LIVING WITH MY GRANDMOTHER ON JADE MEADOW ROAD, IN CLEAR LAKE, TX AND CLAYTON WAS LIVING IN BAYTOWN, TX. THIS WAS MY MOM'S MOTHER, MY SISTER, BROTHER, AND MOTHER STAYED WITH ME. WE STAYED UNTIL I FINISHED 8<sup>TH</sup> GRADE. WE THEN MOVED INTO A RENTAL HOUSE AND CLAYTON CAME BACK AND JOINED US. THIS WAS IN CLEAR LAKE. WE STAYED IN THIS HOUSE FOR ALMOST A YEAR. WE THEN MOVED TO A DIFFERENT RENTAL HOUSE IN THE NEIGHBORHOOD OF MIDDLEBROOK IN CLEAR LAKE. WHILE LIVING HERE, ONE MORNING AFTER I GOT OUT OF THE SHOWER, I WAS LOOKING IN THE MIRROR IN MY ROOM. I ONLY HAD A TOWEL ON. I SAW SOMETHING SHINY OR REFLECTING OUT OF THE CORNER OF MY EYE. I WENT TO LOOK AT WHAT IT WAS AND SAW A CAMERA. I PULLED THE TOWEL UP AND AN IPOD FELL OUT. I CLICKED THE END VIDEO TO SEE HOW LONG IT HAD BEEN RECORDING AND TO WATCH THE VIDEO, IT HAD ONLY BEEN RECORDING FOR A COUPLE MINUTES. I HID THE IPOD UNDER MY MATTRESS AND WENT TO SCHOOL. WHEN I GOT HOME, MY ROOM WAS DIFFERENT. I TOLD MY SISTER WHAT HAD HAPPENED AND THEN GOT IN TROUBLE BECAUSE CLAYTON HAD FOUND A NOTE IN MY ROOM FROM MY FRIEND WHICH WAS NOT APPROPRIATE.

CLAYTON HAD A FRIEND IN NEW YORK WHOSE WIFE'S MOTHER COULDN'T TAKE CARE OF HERSELF ANYMORE AND WANTED TO SELL HER PROPERTY. THE PROPERTY IS LOCATED AT 881 BLANCHARD HILL ROAD IN RUSSELL, NEW YORK. CLAYTON BOUGHT THE PROPERTY, AROUND OCTOBER OF 2012. ME, MY SISTER, MY MOTHER, AND CLAYTON MOVED INTO THE HOUSE. AROUND CHRISTMAS OF 2012, I WENT BACK TO TEXAS WITH CLAYTON AND AROUND THE SAME TIME, MY SISTER WENT BACK TO TEXAS. MY MOM GOT STRESSED OUT ABOUT LIVING UP HERE AND ABOUT MONEY AND RAISING TEENAGERS ON HER OWN. AROUND MARCH OF 2013, WE ALL MOVED BACK TO TEXAS. I WAS GOING TO FAIL THE 8<sup>TH</sup> GRADE, SO IN ORDER TO PASS ONTO HIGH SCHOOL I NEEDED TO BE BACK IN NEW YORK STATE. IN JUNE OF 2013, JUST ME AND MY MOTHER MOVED BACK TO RUSSELL, NEW YORK. CLAYTON MOVED BACK UP HERE IN THE FALL OF 2013 AND MY SISTER AND HER BOYFRIEND, JOHN PARKER, JUST MOVED BACK UP HERE A COUPLE MONTHS AGO.

A COUPLE MONTHS AGO BEFORE MY SISTER MOVED BACK UP HERE, I WAS SITTING ON THE COUCH AND TRYING TO DO HOMEWORK, AND I NEEDED HELP WITH IT. CLAYTON WAS SUPPOSED TO BE HELPING ME. HE WAS SITTING ON THE COUCH NEXT TO ME AND STARTED MOVING CLOSER AND MAKING COMMENTS ABOUT MY BODY. I TOLD HIM TO STOP AND IGNORED HIM. HE TRIED TO TOUCH ME BUT I KEPT SWATTING HIS HANDS AWAY. HE CROWD ME TO THE END OF THE COUCH. HE THEN GRABBED MY BOOBS AND MY VAGINA OVER TOP OF MY CLOTHES. I GOT MAD AND YELLED AT HIM AND WENT INTO MY ROOM AND LOCKED IT. THAT WAS THE LAST TIME CLAYTON EVER TOUCHED ME.

TWO NIGHTS AGO, CLAYTON CAME INTO MY ROOM AND CONFRONTED ME ABOUT WHAT I WAS TELLING MY SISTER'S BOYFRIEND, JOHN PARKER. CLAYTON TOLD ME HE HAD BEEN RECORDING MINE AND JOHN'S CONVERSATION. EARLIER THAT DAY I HAD TOLD JOHN WHAT CLAYTON HAD BEEN DOING TO ME. I TRUSTED JOHN BECAUSE HE UNDERSTOOD. I WAS CRYING AND ASKED CLAYTON NOT TO GET MAD OR DO ANYTHING TO ME. HE JUST LEFT MY ROOM. WHEN I GOT HOME FROM SCHOOL YESTERDAY, I TOLD JOHN HE HAD BEEN RECORDING OUR CONVERSATIONS AND NEEDED TO DO SOMETHING. I TOLD JOHN I DIDN'T FEEL SAFE AND WAS GOING TO LEAVE. I TOLD HIM I WANTED TO STAY WITH MY FIERED, RAIGE, AND NOT TO TELL ANYONE WHERE I WAS GOING.

NOTICE	
(Penal Law § 60, 210-15)	
In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.	
Affirmed under penalty of perjury	
this <u>23</u> day of <u>APRIL</u> , 20 <u>14</u>	<u>LAURYN KATLYN</u>
- M -	DEPOSITION OF DEPOSITION - LAURYN KATLYN
*Subscribed and sworn to before me	HICKS 03/18/14
this _____ day of _____, 20 _____	<u>Chas. J. Hicks</u>
	NOTARIAL PUBLIC
	STATE OF NEW YORK

B0040004

B000000000

1340 03/24/2014 1340 03/24/2014

DELAWARE

SUPPORTING DEPOSITION (CPL § 101.25)

New York State Police

Page 4 of 4

THE PEOPLE OF THE STATE OF NEW YORK

vs

CLAYTON I. BROTHMAN

JOHN CALLED MY MOM AND TOLD HER TO MEET HIM AT THE HUNGER SO THEY COULD TALK. I HAD TO  
PRIDE HOUSE AND TOLD HER I NEEDED TO STAY THERE AFTER A FEW HOURS. MY MOM PICKED UP. WE  
THEN WENT HOME. WE SAT IN THE CAR WHILE MY MOM TALKED TO CLAYTON. CLAYTON CAME OUT TO  
APPOLOISE AND ASKED FOR APOLOGY. CLAYTON BELONGED AT ME AND GAVE TO ME. I LOVE YOU.  
WE'VE BEEN KEEPING OUR SECRET FOR A LONG TIME. MY PARENTS ASKED ME WHAT I WANTED TO DO AND  
AT FIRST I SAID I DIDN'T KNOW AND THEN I LOOKED CLAYTON IN THE EYES AND SAID THAT I WANTED HIM TO  
LEAVE. I WAS CONFUSED ABOUT WHAT WAS GOING ON AND CLAYTON HAD LEFT.

PAUL TOLD ME TODAY THAT SHE AND HER BROTHER THOUGHT I SHOULD TALK WITH THE SCHOOL  
COUNSELOR. PAUL'S BROTHER HAD TALKED WITH THE COUNSELOR AND GUY'S SCHOOL TODAY THEY  
PAUL HAD TO COME DOWN AND SPEAK WITH A COUNSELOR.

LA

<p>IN A WRITTEN DEPOSITION, any person who knowingly gives a false statement with such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A misdemeanor.</p>	
<p>Officer's name (for use in court)</p> <p>By: SA Day of March, 2014</p>	<p>Signature of Officer</p> <p>Signature of Deponent</p> <p>Signature of Notary</p>
<p>Signature of Notary</p> <p>By: Day of March, 2014</p>	<p>Signature of Notary</p> <p>Signature of Deponent</p> <p>Signature of Notary</p>

EXHIBIT 4

DEPOSITION

DEPOSITION OF CLAYTON I. BROTHMAN

CLAYTON T. BROTHMEER

\_\_\_\_\_

LOCATION OF DEPOSITION  
STATE OF NEW YORK  
COUNTY OF ST. LAWRENCE  
VILLAGE OF CANTON

STATE THE FOLLOWING:

A COUPLE DAYS AGO, MY MOM, JANE BROTHERS, PICKED ME UP FROM WORK AT KINNEY'S IN COLVERKNEUR. MY MOM SAID THAT MY BOYFRIEND, JOHN PARKER, WANTED TO MEET US AT THE KINOCO

**NOTICE**  
(Form Law Sen. 915-68)

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.

Affirmed under penalty of perjury  
 this 25 day of APRIL, 20 14  
 at NY  
 "Subscribed and sworn to before me  
 this 25 day of \_\_\_\_\_, 20 14

*X Edwin H. B. H.*  
 Attorney at Law - ROSELYN A. HICKS,  
 1101/54  
 1101/54  
 State of New York  
 County of Westchester

JWS  
☒ JWS  
☐ PJS

\* This form is to be used in any written instrument which is subject to the provisions of the Uniform Fraudulent Transfer Act.

Case 1:15-cr-00198-BKS  
SUPPORTING DEPOSITION (CPL § 802.20)

New York State Police  
Page 2 of 2

THE PEOPLE OF THE STATE OF NEW YORK

VS.

CLAYTON I. BROTHERS

IN RUSSELL, WE MET HIM AT LINDOO, AND JOHN TOLD US THAT LAURYN HAD GONE TO HER FRIEND, PAIGE'S HOUSE. JOHN SAID THAT SHE WAS SCARED BECAUSE SHE THOUGHT MY FATHER WAS GOING TO HURT HER FOR TELLING JOHN WHAT HAD HAPPENED BETWEEN HER AND MY FATHER. JOHN SAID THAT LAURYN WAS BEING MOLESTED BY MY DAD. JOHN SAID THAT MY DAD HAD BEEN RECORDING THE CONVERSATION BETWEEN JOHN AND LAURYN AND HEARD LAURYN TELL JOHN ABOUT HER BEING MOLESTED. WE WENT TO PAIGE'S HOUSE TO PICK LAURYN UP AND WE WENT HOME ONCE HOME. MY MOM GOT OUT OF THE CAR AND WENT TO TALK TO MY DAD IN THE HOUSE. ME, JOHN, AND LAURYN STAYED IN THE CAR. ABOUT 10 MINUTES LATER, MY DAD CAME OUT TO THE CAR AND TRIED TO APOLOGIZE TO MY SISTER AND MAKE IT SEEM LIKE SOMETHING THEY HAD TOGETHER BY SAYING THAT IT WAS A SECRET THEY HAD BEEN KEEPING FOR A LONG TIME. MY DAD THEN GOT OUT OF THE CAR AND LEFT ON HIS MOTORCYCLE. I HAVEN'T SEEN HIM SINCE.

R.H.

<b>NOTICE</b>	
(Form No. 100, 1/14/15)	
<p>is a written statement, any person who knowingly makes a false statement which such person does not believe to be true and committed a crime under the laws of the State of New York punishable by a Class A misdemeanor.</p>	
<p>Attorney Under Power of Proxy</p> <p>By <u>23</u> day of <u>APRIL</u>, 20 <u>14</u></p> <p>Witnessed and sworn to before me</p> <p>By <u>23</u> day of <u>APRIL</u>, 20 <u>14</u></p>	<p><i>Robyn A. Hicks</i> R.H.</p> <p>Notary Public for the State of New York - ROBYN A. HICKS,</p> <p>11/21/04</p> <p><i>Christa L. Lundy</i></p> <p>Notary Public for the State of New York</p> <p>7:28 AM</p>

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13:50 01/26/2016 05:11 01/26/2016



SDNY-4 (3/08)

## SUPPORTING DEPOSITION (CPL § 103.20)

New York State Police

Page 1 of 2

THE PEOPLE OF THE STATE OF NEW YORK  
VS

CLAYTON T. BROTHERS

DEPONENT(S)

LOCATION OF INCIDENT:		
STATE OF NEW YORK	LOCAL CRIMINAL	COURT
COUNTY OF	ST. LAWRENCE	
TOWN	OF	RUSSELL

LOCATION OF DEPOSITION:		
STATE OF NEW YORK		
COUNTY OF	ST. LAWRENCE	
VILLAGE	OF	CANTON

On 04/23/14 at 7:51 ☐ AM ☒ PM, I, JAMIE J. BROTHERS, [REDACTED]

STATE THE FOLLOWING:

I AM CURRENTLY AT 8P CANTON SPEAKING WITH INVESTIGATOR NYE REGARDING MY HUSBAND, CLAYTON BROTHERS. I MARRIED CLAYTON IN 2003 WHEN WE WERE LIVING OUTSIDE HOUSTON IN CLEAR LAKE, TEXAS. I HAVE THREE CHILDREN, ROBYN HICKS, AGE 19, GEORGE HICKS, AGE 17, AND LAURYN HICKS, AGE 15. ROBYN AND LAURYN LIVE UP HERE WITH ME IN RUSSELL AND GEORGE LIVES IN CLEAR LAKE, TX WITH MY MOM.

I REMEMBER WHEN WE WERE LIVING IN THE MIDDLEBROOK NEIGHBORHOOD OF CLEAR LAKE, TX LAURYN HAVING A LETTER ABOUT KISSING A BOY IN THE PARK. I DON'T REMEMBER HOW THE LETTER WAS FOUND. LAURYN GOT GROUNDED FOR THE LETTER.

YESTERDAY, I PICKED ROBYN UP FROM WORK AND MET HER BOYFRIEND, JOHN PARKER, AT THE KUNCOO IN RUSSELL. I ASKED JOHN WHAT WAS GOING ON AND HE SAID THAT LAURYN HAD RUN AWAY. WE BEGAN LOOKING FOR LAURYN AND WHILE WE WERE DOING SO, JOHN TOLD ME LAURYN HAD TOLD HIM THAT CLAYTON HAD BEEN MOLESTING HER. I DIDN'T BELIEVE IT AT FIRST. I ENDED UP GOING BACK HOME TO SEE IF LAURYN HAD RETURNED. I CONFRONTED CLAYTON ABOUT WHAT JOHN HAD TOLD ME AND HE DENIED IT. I THEN ASKED HIM IF DID ANYTHING WITH MY NIECE, TERESA ALBARER, AND HE HANDED ME THE PHONE AND TOLD ME TO CALL HIS SISTER, GENEVIEVE, WHO IS TERESA'S MOTHER. I DON'T KNOW GENEVIEVE'S LAST NAME. I ASKED GENEVIEVE TO ASK TERESA IF ANYTHING SEXUALLY HAD HAPPENED BETWEEN HER AND CLAYTON. I COULD HEAR TERESA TELLING HER MOTHER THAT IT HAD HAPPENED A LONG TIME AGO AND WAS IN THE HANDS OF GOD. I TURNED TO CLAYTON AND TOLD HIM THIS IS REAL AND HE SAID HE WAS SORRY AND ASKED IF I COULD FORGIVE HIM. I THEN WENT TO LOOK FOR LAURYN AND THAT IS WHEN JOHN TOLD ME SHE WAS AT PAIGE'S HOUSE. WE WENT AND GOT HER AND BROUGHT HER HOME. I TOLD THE KIDS TO STAY IN THE CAR AND I WENT INSIDE AND CONFRONTED CLAYTON.

<b>NOTICE</b> (Revised Law § 215.46)	
In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the state of New York punishable as a Class A Misdemeanor.	
Affirmed under penalty of perjury this <u>23</u> day of <u>APRIL</u> , 20 <u>14</u> - s - Subscribed and sworn to before me this _____ day of _____, 20 ____	Signature of deponent - <u>JAMIE J. BROTHERS</u> <u>04/15/14</u> Signature of officer - <u>Christine [REDACTED]</u> Date of deposition - <u>04/23/14</u> Time of deposition - <u>8:00</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
* No person is to be held in custody without proper legal basis.	

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Form 4 (2015)

SUPPORTING DEPOSITION (CPL § 130.10)

New York State Police

Page 2 of 2

THE PEOPLE OF THE STATE OF NEW YORK

VS

CLAYTON T. BROTHERS

I TOLD HIM HE HAD TO LEAVE AND GET OUT. HE BEGGED AND PLEADED WITH ME AND I STILL TOLD HIM HE NEEDED TO LEAVE. CLAYTON WENT OUT TO THE CAR AND GOT IN THE CAR AND TOLD LARRY HE WAS WORRY. CLAYTON GOT OUT OF THE CAR AND WENT INTO THE HOUSE AND GOT HIS STUFF. HE THEN TOOK OFF RUNNING AND SAID HE HAD NO PLACE TO GO. HOURS LATER, CLAYTON CAME BACK AND WAS SOAKING WET. I DIDN'T WANT HIM TO FREEZE TO DEATH SO I TOLD HIM HE COULD SLEEP ON THE FLOOR. IN THE MORNING HE WOKE UP AND I TOLD HIM TO LEAVE. HE GOT ON HIS WHITE HARLEY DAVIDSON, WITH TEXAS REGISTRATION, AND LEFT.

## NOTICE

(Form 400-100, 2/15/03)

In a written statement, any person who knowingly makes a false statement which such person does not believe to be true and is committed to under the laws of the State of New York, punishable as a Class A misdemeanor.

I affirm under penalty of perjury:

My name is CLAYTON T. BROTHERS DOB 11-11-1974

- 2 -

I declare that I am the person who

My name is CLAYTON T. BROTHERS DOB 11-11-1974

Signature of person: CLAYTON T. BROTHERS

CLAYTON T. BROTHERS

CLAYTON T. BROTHERS

CLAYTON T. BROTHERS

Date: 11-11-1974Date: 11-11-1974

DEPOSITION

DEPOSITION

DEPOSITION DEPOSITION DEPOSITION

## EXHIBIT “C”

1. Agency B2 TROOP B - ZONE 2	2. Div/Precinct B211	New York State <b>INCIDENT REPORT</b>	3. ORI NY1440100	5. Case No.	6. Incident No.
7,8,9. Date Reported (Day, Date, Time) WEDNESDAY 04/23/2014 11:30		10,11,12. Occurred On/From (Day, Date, Time) SUNDAY 02/23/2014 12:00		13,14,15. Occurred To (Day, Date, Time) SUNDAY 02/23/2014 12:00	
16. Incident Type SEX OFNS-SEX OFFENSES			17. Business Name		
19. Incident Address (Street Name, Bldg. No., Apt. No.) 861 BLANCHARD HILL ROAD					
20. City/State/Zip RUSSELL NEW YORK 13684					
21. Location Code (TSLED) RUSSELL TOWN 4579		23. No. of Victims 1	24. No. of Suspects 1	26. Victim also Complainant? NO	
Location Type SINGLE FAMILY HOME					
Dispatcher Notes					

22.OFF.No.	LAW	SECTION	SUB	CL	CAT	DEG	ATT	NAME OF OFFENSE	CTS
1.	PL	130.55		B	M	3	C	SEXUAL ABUSE 3RD-SUBJECT ANOTHER TO SEX CONTACT W/O	1
2.	PL	260.10	01	A	M	0	C	ACT IN MANNER INJUR CHILD LESS THAN 17	1

## ASSOCIATED PERSONS

25. TYPE	Name (Last, First, Middle, Title)	DOB	Street Name Bldg., Apt.No., City, State, Zip	Res Phone Bus Phone
CHILD PROTECTION SERVICES	HAYES, ERIN, E		6 JUDSON STREET CANTON NY 13617	
PAROLE OFFICER	LAWRENCE, CHRIS		NEW YORK STATE DIVISION OF PAROLE WATERTOWN NY 13601	
PERSON INTERVIEWED	HICKS, R [REDACTED]		861 BLANCHARD HILL ROAD RUSSELL NY 13684	
PERSON INTERVIEWED	PARKER, JOHN, A		861 BLANCHARD HILL ROAD RUSSELL NY 13684	
PERSON INTERVIEWED	BROTHERS, JAMIE		861 BLANCHARD HILL ROAD RUSSELL NY 13684	
PERSON INTERVIEWED	MARTIN, JOSEPH, D		1325 COUNTY RT 17 RUSSELL NY 13684	
PERSON INTERVIEWED	MARTIN, BRENDA, J		1325 CR 17 RUSSELL NY 13684	
SCHOOL OFFICIAL	SYKES, AMY, L		214 TALCVILLE RD EDWARDS NY 13635	
SUSPECT	BROTHERS, CLAYTON, T		861 BLANCHARD HILL ROAD RUSSELL NY 13684	
VICTIM	HICKS, L [REDACTED]		861 BLANCHARD HILL ROAD RUSSELL NY 13684	

## VICTIM

Name	27. DOB	28. Age	29. Gender	30. Race	31. Ethnicity	32. Handicap	33. Residence
HICKS, L [REDACTED]		14	FEMALE	WHITE	NOT APPLICABLE		

**SUSPECT**

Person ID #	34. Type SUSPECT	35. Name (Last, First, Middle) BROTHERS, CLAYTON, T					
37. Apparent Condition				38. Address (Street Name, Bldg., Apt. No., City, State, Zip) 861 BLANCHARD HILL ROAD RUSSELL NY 13684			
39a. Home Phone (315)302-4042	39b. Work Phone	40. Social Security	41. DOB	42. Age 37	43. Gender MALE	44. Race WHITE	
45. Ethnicity NOT APPLICABLE		46. Skin		47. Occupation			
48. Height 5ft. 10in.	49. Weight 165lbs.	50. Hair BLOND		51. Eyes BLUE		52. Glasses UNKNOWN	53. Build MEDIUM
54. Employer/School				55. Employer Address NY			
56. Scars/Marks/Tattoos /Description							

36. Alias/Nickname/Maiden Name

Last Name	First Name	MiddleName

**NARRATIVE**

Date of Action	Date Written	Officer Name & Rank
04/23/2014	04/23/2014	NYE, CHRISTOPHER (INV)
Narrative		
BCI Case Adoption - Sexual Abuse 3rd/Endangering the Welfare of a Child - Investigator Christopher M. Nye assigned.		
L. [REDACTED] HICKS, age 15, reports being sexually abused by her step-father, CLAYTON BROTHERS.		
Date of Action	Date Written	Officer Name & Rank
04/23/2014	04/23/2014	NYE, CHRISTOPHER (INV)
Narrative		
CPS request assistance:		
On 04/23/14, I was telephonically contacted by St. Lawrence County Child Protective Services Case Worker ERIN HAYES requesting interviewing a 15 year old female at Edwards-Knox Central School, Russell, New York , who told a school counselor she was being sexually abused by her step-father.		
On 04/23/14, at approximately 1:30 p.m., I met HAYES at Edwards-Knox Central School, where we initially interviewed the 15 year old female, L. [REDACTED] HICKS, in the presence of the High School Principal, AMY SYKES. L. HICKS stated that she had been being sexually abused by her step-father, CLAYTON BROTHERS, since she was around 4 years old.		
On 04/23/14, I requested HAYES transport L. HICKS to SP Canton to be further interviewed.		
On 04/23/14, I personally contacted L. HICKS' sister, ROBYN HICKS, at her residence, and advised her that L. HICKS would be at SP Canton being interviewed. I advised R. HICKS to have he mother, JAMIE BROTHERS, come to SP Canton as soon as she comes home.		
Date of Action	Date Written	Officer Name & Rank
04/23/2014	04/23/2014	NYE, CHRISTOPHER (INV)
Narrative		
L. [REDACTED] HICKS interview:		
On 04/23/14, I continued the interview and obtained a supporting deposition from L. [REDACTED] HICKS at SP Canton, in the presence of CPS Caseworker, ERIN HAYES.		
L. HICKS stated she is a 15 year old who is currently a 9th grader at Edwards-Knox Central School. L. HICKS stated CLAYTON BROTHERS is not her biological father and married her mother, JAMIE (HICKS) BROTHERS, when she was about 4 years old. L. HICKS stated she was born in Galvanston, Texas and was raised in Clear Lake, Texas. When L. HICKS was about 5 years old,		



her mother and step-father bought a 2 story house located at 1311 Teal Glen Court in Clear Lake, Texas. L. HICKS stated she lived there with her mother and step-father, as well as her sister, ROBYN HICKS, and brother, GEORGE HICKS. L. HICKS stated she remembered one night, shortly after moving into the house, she had a bad dream and went into her parents bedroom to sleep with them. L. HICKS stated she was awoken by C. BROTHERS having his hands down her pants, underneath her underwear. L. HICKS stated she was confused, so she got out of the bed.

L. HICKS went on to state a few days after this happened, C. BROTHERS came into her bedroom one morning and woke her up by having his hands touching her vagina underneath her underwear. L. HICKS stated this continued on a weekly basis for about a couple years and sometimes it would occur if she would get into bed with him and her mother.

L. HICKS stated a couple years later, C. BROTHERS started taking her hand and making her touch his penis. This started when he would come into her room in the morning, and later on he would have her go to the bathroom with him and have her do the same thing there. While this was happening, C. BROTHERS told L. HICKS she would have to be quiet and not tell anybody or else she would ruin the family. L. HICKS stated C. BROTHERS made a room in his garage and would sometimes wake her up and take her out there where he would touch her vagina and he would have her touch his penis.

L. HICKS stated when she was around 8 years old, her cousin, TERESA ALBARES, was living with her and they were sharing a bedroom. L. HICKS stated one night, C. BROTHERS came into their room while they were sleeping and woke both girls up. They were sitting in the middle of the room, when C. BROTHERS told ALBARES to get on her hands and knees and take her clothes off. L. HICKS stated C. BROTHERS started to have sex with ALBARES by inserting his penis into her vagina. L. HICKS stated C. BROTHERS stopped in the middle of it and tried to convince her to do the same thing. L. HICKS started crying and told him she did not want to. L. HICKS stated she went back to bed and ALBARES and C. BROTHERS left the bedroom. The next morning, L. HICKS woke up and went into the living room and saw ALBARES and C. BROTHERS sitting on the couch underneath a blanket. L. HICKS stated C. BROTHERS told her ALBARES gave her a blowjob and asked if she would too. L. HICKS refused to do so.

L. HICKS continued to state when she was in 4th grade, her family went to Walmart, except for her and C. BROTHERS. L. HICKS stated she went to talk with C. BROTHERS about something and he kept interrupting her and told her to take her shorts off. L. HICKS stated she started to take her shorts off, but hesitated, so C. BROTHERS got aggressive and pulled her shorts down. C. BROTHERS told L. HICKS to get on her hands and knees on the bed. L. HICKS stated C. BROTHERS tried to put his penis inside her vagina, when the main house door opened and her family came in. L. HICKS stated C. BROTHERS threw her shorts and told her to hide, which she did. Eventually she came out of the bedroom from hiding and got into trouble with her mother for not being able to find her.

L. HICKS stated nothing happened for another year or two between her and C. BROTHERS. L. HICKS stated her family was evicted from their house and they moved around a little bit before settling down in a rental house in the Middlebrook neighborhood or Clear Lake, Texas. L. HICKS stated one morning while staying in this house, she was looking in the mirror in her room, after getting out of the shower. She stated she only had a towel on. Out of the corner of her eye, she saw something reflective. When L. HICKS went to see what it was, she discovered it was an ipod recording her. L. HICKS stated she hid it under her mattress and went to school. When she got home, her room was a mess and ipod was gone. L. HICKS stated she told her sister, ROBYN HICKS, what had happened and got into trouble because C. BROTHERS found and note in her bedroom which was inappropriate.

L. HICKS stated around October 2012, C. BROTHERS bought property at 861 Blanchard Hill Road, in the Town of Russell, and her, J. BROTHERS, C. BROTHERS, and R. HICKS moved there. They stayed there until around March 2013, when they moved back to Texas, however, around June 2013, they L. HICKS and her mother moved back to Russell, New York because of L. HICKS' school grade. L. HICKS stated C. BROTHERS moved back to Russell, New York in the fall of 2013, and her sister and sister's boyfriend, JOHN PARKER, moved back to Russell, New York a couple months ago.

L. HICKS stated a couple months ago, before her sister moved back up here, she was sitting on the couch and asked C. BROTHERS for help with her homework. L. HICKS stated C. BROTHERS sat down on the couch and started moving closer to her and making comments about her body. L. HICKS stated C. BROTHERS tried to touch her but she kept swatting his hand away. Eventually he crowded her to the end of the couch and grabbed her boobs and vagina, over the top of her clothes. L. HICKS stated she got mad, yelled at him, and got up and left. L. HICKS stated this was the last time C. BROTHERS ever touched her.

L. HICKS stated two nights ago, C. BROTHERS came into her room and confronted her about she was telling PARKER. C. BROTHERS told L. HICKS he had been recording her conversations and knows she told PARKER about what C. BROTHERS had been doing to her. L. HICKS stated she started crying and C. BROTHERS left the room. L. HICKS stated when she got home from school on 04/22/14, she told PARKER about what C. BROTHERS told her and said she was going to her friend's house. A

few hours later, J. BROTHERS showed up at her friend's house and took her back home. L. HICKS stated she stayed in the car and C. BROTHERS came out of the house and stated, "I'm sorry. I love you. We've been keeping out secret for a long time." L. HICKS stated she was confused with what was going on and wanted C. BROTHERS to leave, which he did.

A copy of the supporting deposition is attached to this report as enclosure #1.

Date of Action	Date Written	Officer Name & Rank
04/23/2014	04/23/2014	NYE, CHRISTOPHER (INV)

#### Narrative

#### ROBYN HICKS interview:

On 04/23/14, ROBYN HICKS came to SP Canton with her mother, JAMIE HICKS. I personally interviewed and obtained a supporting deposition from R. HICKS.

R. HICKS stated her step-dad is CLAYTON BROTHERS, but she has always called him dad. R. HICKS stated she was around 7 or 8 years old when her mother married C. BROTHERS.

R. HICKS stated she remembered when she was around 8 years old, going into her parent's bedroom and getting into bed with them. R. HICKS stated they were living at 1311 Teal Glen Court, Clear Lake, Texas. R. HICKS stated she fell asleep when she got into their bed and was woken up to C. BROTHERS touching her vagina, over her clothes. R. HICKS stated she shook it off and left and just thought it was him looking for her mother. R. HICKS stated she never told anybody about this because she didn't know what to think. R. HICKS stated this was the only time he ever touched her in a sexual way.

R. HICKS stated when she was around 15 or 16 years old and living in the Middlebrook neighborhood of Clear Lake, Texas, her sister, L. HICKS, ran into her room after school one day and told her that she found her dad's ipod hiding in her room recording her. R. HICKS stated she just said OK and didn't know what to think about it. R. HICKS stated the ipod was gone and her was destroyed, like it had been searched.

R. HICKS stated when she was younger, she remembered L. HICKS coming to her and telling her that C. BROTHERS was doing bad things to her and their cousin, TERESA ALBARES, but did not tell her exactly what she meant by bad things.

R. HICKS stated a couple days ago, J. BROTHERS, picked her up from work and said that her boyfriend, JOHN PARKER, wanted to meet at Kunoco in Russell. When they met at Kunoco, PARKER told them L. HICKS went to a friend's house because she was scared of C. BROTHERS. PARKER told them L. HICKS disclosed to him that she had been molested by C. BROTHERS. R. HICKS stated they located L. HICKS and brought her home, where C. BROTHERS came out to the car and apologized to L. HICKS.

A copy of the supporting deposition is attached to this report as enclosure #2.

Date of Action	Date Written	Officer Name & Rank
04/23/2014	04/23/2014	NYE, CHRISTOPHER (INV)

#### Narrative

#### JAMIE BROTHERS interview:

On 04/23/14, I personally interviewed and obtained a supporting deposition from JAMIE BROTHERS, mother of L. HICKS, at SP Canton.

J. BROTHERS stated she married CLAYTON BROTHERS in 2003 and were living outside of Houston, in Clear Lake, Texas. J. BROTHERS stated she has three children: ROBYN HICKS, age 19; GEORGE HICKS, age 17; and L. HICKS, age 15. J. BROTHERS stated R. HICKS and L. HICKS live in Russell, New York with her and G. HICKS lives in Clear Lake, Texas with his grandmother.

J. BROTHERS stated she remembers when they were living in the Middlebrook neighborhood of Clear Lake, Texas, L. HICKS having a letter about kissing a boy in the park. J. BROTHERS does not remember how the letter was found, but remembers L. HICKS being grounded for it.

J. BROTHERS stated yesterday she picked up R. HICKS from work and met R. HICKS' boyfriend, JOHN PARKER, at the Kunoco in Russell. PARKER advised them that L. HICKS had run away and C. BROTHERS had been molesting her. J. BROTHERS stated she went home and confronted C. BROTHERS about the allegations, which he initially denied. J. BROTHERS then asked C. BROTHERS about TERESA ALBARES and C. BROTHERS handed her the phone and told her to call ALBARES' mother, GENEVIEVE. ALBARES stated that something sexually did happen between her and C. BROTHERS, but it was a long

time ago and was in the hands of God. J. BROTHERS then turned to C. BROTHERS and he said he was sorry and asked if she would forgive him. J. BROTHERS then went to L. HICKS' friend's house and picked her up. When they got back home, J. BROTHERS told the kids to stay in the car. J. BROTHERS went in the house and told C. BROTHERS he had to leave. J. BROTHERS stated C. BROTHERS pleaded with her, but she still told him he had to leave. J. BROTHERS stated C. BROTHERS went out and got in the car and then went back into the house and got his stuff. C. BROTHERS then left on foot and came back to the house several hours later. J. BROTHERS told C. BROTHERS he could sleep on the floor and when he woke up in the morning she told him to leave. J. BROTHERS stated he got on his white Harley Davidson, with Texas registration, and left.

A copy of the supporting deposition is attached to this report as enclosure #3.

Date of Action	Date Written	Officer Name & Rank
04/24/2014	04/24/2014	NYE, CHRISTOPHER (INV)
Narrative		

Parole:

On 04/24/14, I was advised by JAMIE BROTHERS that CLAYTON BROTHERS was on parole in New York State for a crime committed in Pennsylvania. J. BROTHERS stated C. BROTHERS' Parole Officer is CHRIS LAWRENCE. J. BROTHERS also stated her and C. BROTHERS Wells Fargo Card was used this morning around 10:30 a.m. at the Salvation Army in Watertown, New York.

On 04/24/14, I advised LAWRENCE of my investigation and he stated C. BROTHERS is a level 4 offender. LAWRENCE stated he could violate him based on the fact he had police contact on 04/10/14 for a V&T ticket and did not report it to him and based on the supporting depositions in this case.

On 04/24/14, Trooper Connor Sutton notified the State Police interstate patrols in Troop D and Troop C to be on the look out for a white Harley Davison with Texas registration, being operated by C. BROTHERS. C. BROTHERS may be enroute to Clifton Forge, Virginia, where his grandparents live. C. BROTHERS failed to surrender his Texas driver's license for a New York State license, and according to J. BROTHERS, the motorcycle is not insured.

Date of Action	Date Written	Officer Name & Rank
04/28/2014	04/28/2014	NYE, CHRISTOPHER (INV)
Narrative		

Follow-up:

On 04/28/14, I telephonically contacted JAMIE BROTHERS, who stated she has not heard from CLAYTON BROTHERS. J. BROTHERS stated C. BROTHERS has not used the debit card since last report.

On 04/28/14, I was telephonically contacted by Parol Officer CHRIS LAWRENCE who stated he notified the police in Clifton Forge, Virginia to check C. BROTHERS' grandparents' residence at 4 Ingalls Circle, Clifton Forge, Virginia. The police stated they checked the residence and the Harley Davidson C. BROTHERS was operating was not there.

On 04/28/14, I was personally advised by CPS Case Worker ERIN HAYES who stated she verified the crimes which occurred in Texas occurred in the Clear Lake Division of the Houston Police Department. HAYES stated she contacted their sex offense unit and left a message for Sergeant White to re-contact her. HAYES stated she would have Sergeant White contact me for copies of supporting depositions. HAYES also provided me with a copy of her Investigation Conclusion Narrative, which stated the case was INDICATED and CLOSED by CPS. A copy of the narrative is attached to this report as enclosure #4.

Date of Action	Date Written	Officer Name & Rank
04/29/2014	04/29/2014	NYE, CHRISTOPHER (INV)
Narrative		

Weapons:

On 04/29/14, I was contacted by Parole Office CHRIS LAWRENCE, who advised me JOHN PARKER, located several weapons, including assault weapons at the residence of CLAYTON BROTHERS, at 861 Blanchard Hill Road, in the Town of Russell. This case was adopted by Troop B GIU Investigator James DiSalvo. (Refer to SJS#5633862).

Date of Action	Date Written	Officer Name & Rank
04/29/2014	04/29/2014	NYE, CHRISTOPHER (INV)
Narrative		

CPS Hotlined Texas:

On 04/29/14, I was telephonically contacted by CPS Caseworker ERIN HAYES who advised me she made a hotline referral today



to the State of Texas regarding this case. HAYES stated she has not heard back from Sergeant White of the Clear Lake Police Department.

Date of Action	Date Written	Officer Name & Rank
05/01/2014	05/01/2014	NYE, CHRISTOPHER (INV)

**Narrative**

Sergeant White notified.:

On 05/01/14, I was telephonically contacted by CPS Case Worker ERIN HAYES, who advised me she made contact with Sergeant Lauren White of the Houston Police Department. HAYES stated she was emailing her report to Sergeant White. I advised HAYES I would also email a draft copy of my SJS, along with supporting depositions I obtained to Sergeant White..

Date of Action	Date Written	Officer Name & Rank
05/13/2014	05/13/2014	NYE, CHRISTOPHER (INV)

**Narrative**

Parole Absconder:

On 05/13/14, I telephonically contacted Parole Officer CHRIS LAWRENCE who advised NYS Parole was not obtaining a warrant for CLAYTON BROTHERS, but the violation was turned over to Pennsylvania Parole to obtain a warrant, since that was where he was initially on parole.

On 05/13/14, I checked C. BROTHERS' driver's license in eJustice, which indicated Pennsylvania Department of Probation and Parole issued a warrant for C. BROTHERS' for violation of parole. The date of the warrant is 05/08/14.

Date of Action	Date Written	Officer Name & Rank
05/13/2014	05/13/2014	NYE, CHRISTOPHER (INV)

**Narrative**

Texas Authorities:

On 05/13/14, I telephonically contacted Detective Darren Crump, Houston Police Department, and advised him of the warrant from Pennsylvania for CLAYTON BROTHERS. I advised him of the charges in this case and the case adopted by Troop B GIU. Detective Crump stated he may need L [REDACTED] HICKS medically examined in order to pursue charges in the state of Texas. Detective Crump stated he has already made contact with NYS CPS to make arrangements to have the examine completed. Detective Crump stated he is in the process of searching for C. BROTHERS. Detective Crump stated he would contact me with any new information.

Date of Action	Date Written	Officer Name & Rank
05/14/2014	05/14/2014	NYE, CHRISTOPHER (INV)

**Narrative**

JAMIE BROTHERS update:

On 05/14/14, I telephonically contacted JAMIE BROTHERS and provided her with an update of the investigation. J. BROTHERS stated she has heard from CLAYTON BROTHERS.

Date of Action	Date Written	Officer Name & Rank
05/15/2014	05/15/2014	NYE, CHRISTOPHER (INV)

**Narrative**

US Marshalls:

On 05/15/14, I was telephonically contacted by US Marshall Jeff Long, Pittsburg, PA, who advised me he has been assigned the case in the search for CLAYTON BROTHERS for absconding from PA Parole. I provided Marshall Long with details of the case. He stated he would contact me if they locate BROTHERS.

Date of Action	Date Written	Officer Name & Rank
05/17/2014	05/17/2014	NYE, CHRISTOPHER (INV)

**Narrative**

Missing Items/Found Gun:

On 05/17/14, I patrolled to 861 Blanchard Hill Road, in the Town of Russell, and re-interviewed JAMIE BROTHERS. J. BROTHERS stated today she went out to her garage to show her friend things, and noticed a yellow lathe and band saw missing from the garage. J. BROTHERS stated she told JOHN PARKER about it and he stated he noticed the items missing several days earlier. J. BROTHERS also stated he daughter's, L [REDACTED] HICKS, cell phone was acting "messed up". J. BROTHERS did not

know if CLAYTON BROTHERS had return to take the items or possibly had someone else go to the house to get them or if someone else just stole them. J. BROTHERS also stated a friend of C. BROTHERS', JOSEPH MARTIN, lives just down the road. J. BROTHERS stated C. BROTHERS met MARTIN while in prison in Pennsylvania. J. BROTHERS stated she and C. BROTHERS bought MARTIN'S mother's house, and MARTIN was in prison for murder.

On 05/17/14, I personally interviewed L. HICKS. L. HICKS stated over the last several days her phone has been acting "messed up". L. HICKS stated messages were displaying as read, when she had not read them, and someone had been deleting her contacts. Since it was an Apple product, I inquired if she had been using iCloud and C. BROTHERS gaining access to the phone through that means. L. HICKS stated the phone used to belong to C. BROTHERS and when she checked her phone, there was an iCloud account for C. BROTHERS. L. HICKS stated she was delete that account from her phone. L. HICKS also stated she has several screen shots of C. BROTHERS' contacts from when he had the phone. L. HICKS stated she would email me the screen shots.

On 05/17/14, I personally interviewed JOHN PARKER. PARKER stated a couple days earlier, he was getting ready to move a lawn tractor out of the garage and there was a laundry basket on top. PARKER stated when he went to move the basket, a long gun fell out of it and there was a large quantity of ammunition in the bottom of the basket. PARKER went to state that today J. BROTHERS notified him a wood lathe was missing from the garage. PARKER stated he noticed the lathe missing several days earlier, but did not tell J. BROTHERS because he knew she had a lot on her mind. PARKER stated today he also noticed a band saw missing from the garage. PARKER stated the lathe was a yellow Powermatic, but did not know the description of the band saw. PARKER stated he did not take either and does not know who did. A supporting deposition was obtained and a copy is attached to this report as enclosure #5.

On 05/17/14, I secured the gun and ammunition in SP Canton BCI evidence locker and notified Investigator James Disalvo, since he adopted the case regarding C. BROTHERS unlawfully possessing the guns. (Refer to SJS# 5633862).

On 05/17/14, I personally interviewed MARTIN. MARTIN would not tell me why he served time in a Pennsylvania prison. MARTIN stated the last time he spoke with C. BROTHERS was around the time he left. MARTIN stated C. BROTHERS asked him a question and he stated "No". MARTIN would not tell me what the question was. MARTIN denied taking the lathe and band saw.

Date of Action	Date Written	Officer Name & Rank
05/18/2014	05/18/2014	NYE, CHRISTOPHER (INV)

#### Narrative

#### Found Ammo:

On 05/18/14, I patrolled to 861 Blanchard Hill Road, in the Town of Russell, after being advised by JOHN PARKER, he had found more high capacity magazines, with rounds in each. (Refer to SJS#5625525). While at the scene, I personally interviewed St. Lawrence County Deputy Sergeant Marty Domoulin, who is friends with the BROTHERS/HICKS family and lives nearby. I advised Sergeant Domoulin of the case, and he statedd he would be observant for CLAYTON BROTHERS or any other suspicious behavior in the area.

On 05/18/14, I personally interviewed BRENDA MARTIN, who is the wife of JOSEPH MARTIN, B. MARTIN stated she has not seen C. BROTHERS in some time and stated she would contact me if she has any contact with him. B. MARTIN stated her husband and C. BROTHERS met at the Huntington Prison, in Pennsylvania, when they were both serving time.

Date of Action	Date Written	Officer Name & Rank
05/22/2014	05/22/2014	NYE, CHRISTOPHER (INV)

#### Narrative

#### PA Parole Officer Charles Eckert:

On 05/20/14, I was telephonically contacted by Pennsylvania Parole Officer CHARLES ECKERT who stated he has been assigned to locate CLAYTON BROTHERS. I provided ECKERT with an update of this case and provided him with the registraion plate to BROTHERS' motorcyle as well as some of BROTHERS' contacts. ECKERT stated he would advise me when they locate BROTHERS.

Date of Action	Date Written	Officer Name & Rank
06/12/2014	06/12/2014	NYE, CHRISTOPHER (INV)

#### Narrative

#### PA Parole:

On 06/12/14, I telephonically contacted PA Parole Officer CHARLES ECKERT who stated they still have not located CLAYTON BROTHERS.

Date of Action	Date Written	Officer Name & Rank
06/17/2014	06/17/2014	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
Band Saw and Lathe:		
On 06/17/14, I personally interviewed JAIME BROTHERS who state her daughter, ROBYN HICKS, sold the lathe and band saw, which were reported missing by J. BROTHERS on 05/17/14. J. BROTHERS stated she did not wish to pursue criminal charges against her daughter for seeing the items.		
Date of Action	Date Written	Officer Name & Rank
06/17/2014	06/17/2014	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
No new information:		
On 06/17/14, I personally interviewed JAIME BROTHERS, who stated neither she, nor her daughters, have had any sort of contact with CLAYTON BROTHERS. I advised J. BROTHERS I had been in contact with Pennsylvania Parole in an attempt to locate c. BROTHERS. J. BROTHERS stated she would contact me if she gets any new information about where C. BROTHERS may be.		
Date of Action	Date Written	Officer Name & Rank
07/26/2014	07/26/2014	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
GoDaddy.com:		
On 07/26/14, I was telephonically contacted by JAMIE BROTHERS who stated she received a notice from Wells Fargo, (800) 869-3557, stating her joint account with CLAYTON BROTHERS was used this morning on the website godaddy.com, (480)505-8855. J. BROTHERS stated the Wells Fargo claim number was 10726142215 and they did not have an ip address for the transaction.		
Date of Action	Date Written	Officer Name & Rank
07/29/2014	07/29/2014	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
GoDaddy.com follow-up:		
On 07/29/14, I received a phone call from JAMIE BROTHERS stating the transaction to GoDaddy.com was a yearly reoccurring transaction and not a recent transaction.		
Date of Action	Date Written	Officer Name & Rank
10/21/2014	10/21/2014	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
Parole:		
On 10/21/14, I contacted CHARLES ECKERT, Pennsylvania Parole, via email. ECKERT stated he had no new information to offer about the whereabouts of CLAYTON BROTHERS.		
Date of Action	Date Written	Officer Name & Rank
01/05/2015	01/05/2015	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
JAIME BROTHERS:		
On 01/05/15, I telephonically contacted JAMIE BROTHERS, who stated she has had no contact with CLAYTON BROTHERS or knows where he might be. I provided J. BROTHERS with an update of the investigation.		
Date of Action	Date Written	Officer Name & Rank
01/26/2015	01/26/2015	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
PA Parole:		
On 01/26/15, I was telephonically contacted by Heather Kerstetter, PA Parole, who advised me CLAYTON BROTHERS was taken into custody in South Carolina and is currently detained in Lexington County Detention Facility. Kerstetter stated she would re-contact me once BROTHERS is extradited to Pennsylvania, so he can be interviewed relative to this investigation and GIU Case #		
On 01/26/15, I telephonically advised JAMIE BROTHERS that CLAYTON BROTHERS was in custody in South Carolina awaiting extradition to Pennsylvania.		

<b>Date of Action</b>	<b>Date Written</b>	<b>Officer Name &amp; Rank</b>
02/10/2015	02/14/2015	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
Federal Case:		
On 02/10/15, I personally met with Homeland Security Federal Agent Christopher Revord at SP Canton to discuss presenting the weapon's case (SJS# ), which is associated with this case to the United State Attorney General.		
On 02/12/15, I was personally advised by Revord that the United States Attorney General is interested in prosecuting the weapons's case (SJS# ). I emailed Revord a receipt showing CLAYTON BROTHERS purchased 1000 rounds of 5.56x45mm ammo while living in Texas in 2011.		
<b>Date of Action</b>	<b>Date Written</b>	<b>Officer Name &amp; Rank</b>
02/14/2015	02/14/2015	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
Updated JAMIE BROTHERS:		
On 02/14/15, I telephonically advised JAMIE BROTHERS of the possibility the United States Attorney General may prosecute the weapon's case (SJS# ), which is associated with this case. I advised BROTHERS of the possibility of no arrest in this case, since it is only a misdemeanor and the federal charges were likely to be more severe. BROTHERS stated she would fully support that decision.		
<b>Date of Action</b>	<b>Date Written</b>	<b>Officer Name &amp; Rank</b>
03/03/2015	03/04/2015	NYE, CHRISTOPHER (INV)
<b>Narrative</b>		
Houston Police Department:		
On 03/03/15, I was telephonically contacted by Officer Kimberly Neal, Houston Police Department, who stated the Detective that was assigned this case in Texas was promoted shortly after I emailed the case to their department, and the case was never reassigned or worked on. Officer Neal stated she is in the process of reassigning the case and would expedite the investigation involving the sexual abuse of LAURYN HICKS in Texas.		

## ADMINISTRATIVE

74. Inquiries	75. NYSPIN Message No.	76. Complainant Signature	
77. Reporting Officer Signature (Include Rank) INV CHRISTOPHER NYE	78. ID No. 3253	79. Supervisor Signature (Include Rank) SR INV TIMOTHY PEETS	80. ID No. 1992
81. Status PENDING INVESTIGATION	82. Status Date 04/23/2014	83. Notified/TOT	
Solvability Total			0

## EXHIBIT "D"



Number called  
 Originates  
 (Call came from)

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+13153024042	8323221275	3153024042	4/27/2014 4:19:43 AM	12:19
13155354952	3153024042 768	3155354952	4/27/2014 10:50:43 AM	6:50 AM
+13153024042	3152273319	3153024042	4/27/2014 1:38:59 PM	9:38 AM
+13155354952	3153024042 781	3155354952	4/27/2014 2:50:42 PM	10:50
+13153024042	2814618816 1887	3153024042	4/27/2014 3:11:19 PM	11:11 AM
+13153024042	2814618816 80	3153024042	4/27/2014 3:55:37 PM	11:55 AM
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+13153024042	2814618816 539	3153024042	4/27/2014 7:05:28 PM	3:05
+13153024042	4053143445 558	3153024042	4/27/2014 9:38:08 PM	5:38
+13152873600	3153024042 111	3152873600	4/28/2014 2:33:14 AM	10:33 PM
3153868260	3153024042 117	3153868260	4/28/2014 8:16:55 AM	8:16 AM LOCAL
+13152873600	3153024042 29	3152873600	4/28/2014 9:34:12 AM	5:34
+13152873600	3153024042 1	3152873600	4/28/2014 9:40:40 AM	5:40
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+13153790012 *	3153024042 116	3153790012	4/29/2014 12:32:20 AM	8:32
+13157793000	3153024042 38	3157793000	4/29/2014 1:37:01 AM	8:37 PM

SUNDAY

MONDAY